# **EXHIBIT A**

# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

HONEYWELL INTERNATIONAL INC.	)	
and HONEYWELL INTELLECTUAL	)	
PROPERTIES INC.,	)	
	)	
Plaintiffs,	)	
	)	C.A. No. 04-1338-***
V.	)	C.A. No. 04-1337-***
	)	C.A. No. 04-1536-***
APPLE COMPUTER, INC., et al.	)	(Consolidated)
	)	
Defendants.	)	

# OPTREX AMERICA, INC'S SECOND SET OF REQUESTS FOR ADMISSIONS (NOS. 30-191) TO HONEYWELL

Optrex America, Inc. ("Optrex"), propounds the following Second Set of Request for Admissions (Nos. 30 - 191) to Honeywell International Inc. and Honeywell Intellectual Properties Inc. ("Honeywell"), pursuant to the provisions of Fed. R. Civ. P. 36.

# **DEFINITIONS**

- "Optrex" means "Optrex America, Inc.," including its divisions, 1. subsidiaries, holding companies, officers, directors, trustees, agents, employees, predecessors, or any other representatives.
- 2. Honeywell" means Honeywell International Inc., Honeywell Intellectual Properties Inc., and includes, without limitation, their divisions, subsidiaries, holding companies, officers, directors, trustees, agents, employees, predecessors (including, AlliedSignal), or any other representatives.
  - 3. "LCD" means "Liquid Crystal Display."
  - "371 Patent" means U.S. Patent No. 5,280,371. 4.

065004.1001 DB02:6023642.1

- 5. "SID" means "Society for Information Display," presently headquartered at 610 S. 2nd Street, San Jose, CA 95112-4006, of which Honeywell, Inc. has been indicated as a "sustaining member."
- 6. "SID Convention" means the primary and largest convention, seminar and exhibition organized and sponsored by SID, generally held on or around May or June of every calendar year, alternating between the East and West Coast of the United States.
- 7. "Optrex Exhibit Booth" means the booth, booths, and/or pavilion on the floor of the SID Convention at which Optrex displayed its LCD technology, its LCD modules, and/or the products into which its LCD modules or LCD technology is used.
- 8. "3M Exhibit Booth" means the booth, booths, or pavilion on the floor of the SID Convention at which 3M Company displayed Scotch Optical Lighting Film (SOLF) products, and/or Brightness Enhancing Film (BEF) products for use with LCD products.
- 9. All other terms and phrases herein are to be given their plain and ordinary meaning.

#### REQUESTS

#### ADMISSION NO. 30

Admit that Optrex LCD module no. F-55130GNCJ-LW-AEN, having the structure shown in engineering drawing No. LGP55130B, found at Bates number OAI 0126546, does not infringe any claim in the '371 Patent.

## **ADMISSION NO. 31**

Admit that in 1994, engineers, product designers, and/or management from Honeywell received copies of SID's monthly periodical, "Information Display."

Admit that as a matter of general practice in 1994, engineers, product designers, and/or management from Honeywell would review SID's monthly periodical "Information Display," within 1 month after receiving the periodical from SID.

# **ADMISSION NO. 33**

Admit that engineers, product designers, and/or management from Honeywell attended the 1994 SID Convention.

# **ADMISSION NO. 34**

Admit that engineers, product designers, and/or management from Honeywell visited the Optrex Exhibit Booth at the 1994 SID Convention.

### **ADMISSION NO. 35**

Admit that engineers, product designers, and/or management from Honeywell viewed the products displayed at the Optrex Exhibit Booth at the 1994 SID Convention.

#### **ADMISSION NO. 36**

Admit that engineers, product designers, and/or management from Honeywell spoke with Optrex employees at the Optrex Exhibit Booth at the 1994 SID Convention.

#### **ADMISSION NO. 37**

Admit that engineers, product designers, and/or management from Honeywell visited a 3M Exhibit Booth at the 1994 SID Convention.

### **ADMISSION NO. 38**

Admit that engineers, product designers, and/or management from Honeywell viewed products displayed at a 3M Exhibit Booth at the 1994 SID Convention.

# ADMISSION NO. 39

Admit that engineers, product designers, and/or management from Honeywell spoke with 3M employees at a 3M Exhibit Booth at the 1994 SID Convention.

Admit that in 1995, SID listed Honeywell, Inc. as a "sustaining member" of SID.

# **ADMISSION NO. 41**

Admit that in 1995, engineers, product designers, and/or management from Honeywell received copies of SID's monthly periodical, "Information Display."

# **ADMISSION NO. 42**

Admit that as a matter of general practice in 1995, engineers, product designers, and/or management from Honeywell would review SID's monthly periodical "Information Display," within 1 month after receiving the periodical from SID.

# **ADMISSION NO. 43**

Admit that engineers, product designers, and/or management from Honeywell attended the 1995 SID Convention.

# **ADMISSION NO. 44**

Admit that engineers, product designers, and/or management from Honeywell visited the Optrex Exhibit Booth at the 1995 SID Convention.

### **ADMISSION NO. 45**

Admit that engineers, product designers, and/or management from Honeywell viewed the products displayed at the Optrex Exhibit Booth at the 1995 SID Convention.

# ADMISSION NO. 46

Admit that engineers, product designers, and/or management from Honeywell spoke with Optrex employees at the Optrex Exhibit Booth at the 1995 SID Convention.

#### ADMISSION NO. 47

Admit that engineers, product designers, and/or management from Honeywell visited a 3M Exhibit Booth at the 1995 SID Convention.

Admit that engineers, product designers, and/or management from Honeywell viewed products displayed at a 3M Exhibit Booth at the 1995 SID Convention.

# **ADMISSION NO. 49**

Admit that engineers, product designers, and/or management from Honeywell spoke with 3M employees at a 3M Exhibit Booth at the 1995 SID Convention.

#### **ADMISSION NO. 50**

Admit that in 1996, SID listed Honeywell, Inc. as a "sustaining member" of SID.

# **ADMISSION NO. 51**

Admit that in 1996, engineers, product designers, and/or management from Honeywell received copies of SID's monthly periodical, "Information Display."

# **ADMISSION NO. 52**

Admit that as a matter of general practice in 1996, engineers, product designers, and/or management from Honeywell would review SID's monthly periodical "Information Display," within 1 month after receiving the periodical from SID.

#### **ADMISSION NO. 53**

Admit that engineers, product designers, and/or management from Honeywell attended the 1996 SID Convention.

#### ADMISSION NO. 54

Admit that engineers, product designers, and/or management from Honeywell visited the Optrex Exhibit Booth at the 1996 SID Convention.

### **ADMISSION NO. 55**

Admit that engineers, product designers, and/or management from Honeywell viewed the products displayed at the Optrex Exhibit Booth at the 1996 SID Convention.

Admit that engineers, product designers, and/or management from Honeywell spoke with Optrex employees at the Optrex Exhibit Booth at the 1996 SID Convention.

# **ADMISSION NO. 57**

Admit that engineers, product designers, and/or management from Honeywell visited the 3M Exhibit Booth at the 1996 SID Convention.

## **ADMISSION NO. 58**

Admit that engineers, product designers, and/or management from Honeywell viewed products displayed at the 3M Exhibit Booth at the 1996 SID Convention.

# **ADMISSION NO. 59**

Admit that engineers, product designers, and/or management from Honeywell spoke with 3M employees at the 3M Exhibit Booth at the 1996 SID Convention.

# **ADMISSION NO. 60**

Admit that in 1997, SID listed Honeywell, Inc. as a "sustaining member" of SID.

## ADMISSION NO. 61

Admit that in 1997, engineers, product designers, and/or management from Honeywell received copies of SID's monthly periodical, "Information Display."

#### ADMISSION NO. 62

Admit that as a matter of general practice in 1997, engineers, product designers, and/or management from Honeywell would review SID's monthly periodical "Information Display," within 1 month after receiving the periodical from SID.

#### ADMISSION NO. 63

Admit that engineers, product designers, and/or management from Honeywell attended the 1997 SID Convention.

Admit that engineers, product designers, and/or management from Honeywell visited the Optrex Exhibit Booth at the 1997 SID Convention.

# **ADMISSION NO. 65**

Admit that engineers, product designers, and/or management from Honeywell viewed the products displayed at the Optrex Exhibit Booth at the 1997 SID Convention.

## ADMISSION NO. 66

Admit that engineers, product designers, and/or management from Honeywell spoke with Optrex employees at the Optrex Exhibit Booth at the 1997 SID Convention.

# ADMISSION NO. 67

Admit that engineers, product designers, and/or management from Honeywell visited the 3M Exhibit Booth at the 1997 SID Convention.

# ADMISSION NO. 68

Admit that engineers, product designers, and/or management from Honeywell viewed products displayed at the 3M Exhibit Booth at the 1997 SID Convention.

#### ADMISSION NO. 69

Admit that engineers, product designers, and/or management from Honeywell spoke with 3M employees at the 3M Exhibit Booth at the 1997 SID Convention.

#### ADMISSION NO. 70

Admit that in 1998, SID listed Honeywell, Inc. as a "sustaining member" of SID.

#### **ADMISSION NO. 71**

Admit that in 1998, engineers, product designers, and/or management from Honeywell received copies of SID's monthly periodical, "Information Display."

Admit that as a matter of general practice in 1998, engineers, product designers, and/or management from Honeywell would review SID's monthly periodical "Information Display," within 1 month after receiving the periodical from SID.

# **ADMISSION NO. 73**

Admit that engineers, product designers, and/or management from Honeywell attended the 1998 SID Convention.

#### ADMISSION NO. 74

Admit that engineers, product designers, and/or management from Honeywell visited the Optrex Exhibit Booth at the 1998 SID Convention.

# **ADMISSION NO. 75**

Admit that engineers, product designers, and/or management from Honeywell viewed the products displayed at the Optrex Exhibit Booth at the 1998 SID Convention.

# **ADMISSION NO. 76**

Admit that engineers, product designers, and/or management from Honeywell spoke with Optrex employees at the Optrex Exhibit Booth at the 1998 SID Convention.

## ADMISSION NO. 77

Admit that engineers, product designers, and/or management from Honeywell visited the 3M Exhibit Booth at the 1998 SID Convention.

# **ADMISSION NO. 78**

Admit that engineers, product designers, and/or management from Honeywell viewed products displayed at the 3M Exhibit Booth at the 1998 SID Convention.

#### ADMISSION NO. 79

Admit that engineers, product designers, and/or management from Honeywell spoke with 3M employees at the 3M Exhibit Booth at the 1998 SID Convention.

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Admit that in 1999, SID listed Honeywell, Inc. as a "sustaining member" of SID.

# **ADMISSION NO. 81**

Admit that in 1999, engineers, product designers, and/or management from Honeywell received copies of SID's monthly periodical, "Information Display."

# **ADMISSION NO. 82**

Admit that as a matter of general practice in 1999, engineers, product designers, and/or management from Honeywell would review SID's monthly periodical "Information Display," within 1 month after receiving the periodical from SID.

# **ADMISSION NO. 83**

Admit that engineers, product designers, and/or management from Honeywell attended the 1999 SID Convention.

#### ADMISSION NO. 84

Admit that engineers, product designers, and/or management from Honeywell visited the Optrex Exhibit Booth at the 1999 SID Convention.

### **ADMISSION NO. 85**

Admit that engineers, product designers, and/or management from Honeywell viewed the products displayed at the Optrex Exhibit Booth at the 1999 SID Convention.

# **ADMISSION NO. 86**

Admit that engineers, product designers, and/or management from Honeywell spoke with Optrex employees at the Optrex Exhibit Booth at the 1999 SID Convention.

# **ADMISSION NO. 87**

Admit that engineers, product designers, and/or management from Honeywell visited the 3M Exhibit Booth at the 1999 SID Convention.

Admit that engineers, product designers, and/or management from Honeywell viewed products displayed at the 3M Exhibit Booth at the 1999 SID Convention.

# **ADMISSION NO. 89**

Admit that engineers, product designers, and/or management from Honeywell spoke with 3M employees at the 3M Exhibit Booth at the 1999 SID Convention.

## **ADMISSION NO. 90**

Admit that in 2000, SID listed Honeywell, Inc. as a "sustaining member" of SID.

#### **ADMISSION NO. 91**

Admit that in 2000, engineers, product designers, and/or management from Honeywell received copies of SID's monthly periodical, "Information Display."

#### ADMISSION NO. 92

Admit that as a matter of general practice in 2000, engineers, product designers, and/or management from Honeywell would review SID's monthly periodical "Information Display," within 1 month after receiving the periodical from SID.

### **ADMISSION NO. 93**

Admit that engineers, product designers, and/or management from Honeywell attended the 2000 SID Convention.

#### **ADMISSION NO. 94**

Admit that engineers, product designers, and/or management from Honeywell visited the Optrex Exhibit Booth at the 2000 SID Convention.

#### ADMISSION NO. 95

Admit that engineers, product designers, and/or management from Honeywell viewed the products displayed at the Optrex Exhibit Booth at the 2000 SID Convention.

Admit that engineers, product designers, and/or management from Honeywell spoke with Optrex employees at the Optrex Exhibit Booth at the 2000 SID Convention.

# **ADMISSION NO. 97**

Admit that engineers, product designers, and/or management from Honeywell visited the 3M Exhibit Booth at the 2000 SID Convention.

#### ADMISSION NO. 98

Admit that engineers, product designers, and/or management from Honeywell viewed products displayed at the 3M Exhibit Booth at the 2000 SID Convention.

# ADMISSION NO. 99

Admit that engineers, product designers, and/or management from Honeywell spoke with 3M employees at the 3M Exhibit Booth at the 2000 SID Convention.

# **ADMISSION NO. 100**

Admit that in 2001, SID listed Honeywell, Inc. as a "sustaining member" of SID.

#### **ADMISSION NO. 101**

Admit that in 2001, engineers, product designers, and/or management from Honeywell received copies of SID's monthly periodical, "Information Display."

### **ADMISSION NO. 102**

Admit that as a matter of general practice in 2001, engineers, product designers, and/or management from Honeywell would review SID's monthly periodical "Information Display," within 1 month after receiving the periodical from SID.

### ADMISSION NO. 103

Admit that engineers, product designers, and/or management from Honeywell attended the 2001 SID Convention.

Admit that engineers, product designers, and/or management from Honeywell visited the Optrex Exhibit Booth at the 2001 SID Convention.

# **ADMISSION NO. 105**

Admit that engineers, product designers, and/or management from Honeywell viewed the products displayed at the Optrex Exhibit Booth at the 2001 SID Convention.

## **ADMISSION NO. 106**

Admit that engineers, product designers, and/or management from Honeywell spoke with Optrex employees at the Optrex Exhibit Booth at the 2001 SID Convention.

# **ADMISSION NO. 107**

Admit that engineers, product designers, and/or management from Honeywell visited the 3M Exhibit Booth at the 2001 SID Convention.

# **ADMISSION NO. 108**

Admit that engineers, product designers, and/or management from Honeywell viewed products displayed at the 3M Exhibit Booth at the 2001 SID Convention.

### **ADMISSION NO. 109**

Admit that engineers, product designers, and/or management from Honeywell spoke with 3M employees at the 3M Exhibit Booth at the 2001 SID Convention.

# **ADMISSION NO. 110**

Admit that in 2002, SID listed Honeywell, Inc. as a "sustaining member" of SID.

### **ADMISSION NO. 111**

Admit that in 2002, engineers, product designers, and/or management from Honeywell received copies of SID's monthly periodical, "Information Display."

Admit that as a matter of general practice in 2002, engineers, product designers, and/or management from Honeywell would review SID's monthly periodical "Information Display," within 1 month after receiving the periodical from SID.

# **ADMISSION NO. 113**

Admit that engineers, product designers, and/or management from Honeywell attended the 2002 SID Convention.

# **ADMISSION NO. 114**

Admit that engineers, product designers, and/or management from Honeywell visited the Optrex Exhibit Booth at the 2002 SID Convention.

### **ADMISSION NO. 115**

Admit that engineers, product designers, and/or management from Honeywell viewed the products displayed at the Optrex Exhibit Booth at the 2002 SID Convention.

# ADMISSION NO. 116

Admit that engineers, product designers, and/or management from Honeywell spoke with Optrex employees at the Optrex Exhibit Booth at the 2002 SID Convention.

#### **ADMISSION NO. 117**

Admit that engineers, product designers, and/or management from Honeywell visited the 3M Exhibit Booth at the 2002 SID Convention.

### **ADMISSION NO. 118**

Admit that engineers, product designers, and/or management from Honeywell viewed products displayed at the 3M Exhibit Booth at the 2002 SID Convention.

#### **ADMISSION NO. 119**

Admit that engineers, product designers, and/or management from Honeywell spoke with 3M employees at the 3M Exhibit Booth at the 2002 SID Convention.

Admit that in 2003, SID listed Honeywell, Inc. as a "sustaining member" of SID.

# **ADMISSION NO. 121**

Admit that in 2003, engineers, product designers, and/or management from Honeywell received copies of SID's monthly periodical, "Information Display."

# **ADMISSION NO. 122**

Admit that as a matter of general practice in 2003, engineers, product designers, and/or management from Honeywell would review SID's monthly periodical "Information Display," within 1 month after receiving the periodical from SID.

### **ADMISSION NO. 123**

Admit that engineers, product designers, and/or management from Honeywell attended the 2003 SID Convention.

# **ADMISSION NO. 124**

Admit that engineers, product designers, and/or management from Honeywell visited the Optrex Exhibit Booth at the 2003 SID Convention.

# ADMISSION NO. 125

Admit that engineers, product designers, and/or management from Honeywell viewed the products displayed at the Optrex Exhibit Booth at the 2003 SID Convention.

# **ADMISSION NO. 126**

Admit that engineers, product designers, and/or management from Honeywell spoke with Optrex employees at the Optrex Exhibit Booth at the 2003 SID Convention.

## **ADMISSION NO. 127**

Admit that engineers, product designers, and/or management from Honeywell visited the 3M Exhibit Booth at the 2003 SID Convention.

Admit that engineers, product designers, and/or management from Honeywell viewed products displayed at the 3M Exhibit Booth at the 2003 SID Convention.

# **ADMISSION NO. 129**

Admit that engineers, product designers, and/or management from Honeywell spoke with 3M employees at the 3M Exhibit Booth at the 2003 SID Convention.

#### ADMISSION NO. 130

Admit that Optrex LCD module no. DMF-50414NCU-FW AA, having the structure shown in engineering drawing No. UE 10141B, found at Bates number OAI 0126552, does not infringe claim 3 of the '371 Patent.

# **ADMISSION NO. 131**

Admit that Optrex LCD module no. DMF-50414NCU-FW AA, having the structure shown in engineering drawing No. UE 10141B, found at Bates number OAI 0126552, does not infringe any claim in the '371 Patent.

#### ADMISSION NO. 132

Admit that Optrex LCD module no. DMF-50414NCU-FW-3 AD, having the structure shown in engineering drawing No. UE 10150B, found at Bates number OAI 0126554, does not infringe claim 3 of the '371 Patent.

#### **ADMISSION NO. 133**

Admit that Optrex LCD module no. DMF-50414NCU-FW-3 AD, having the structure shown in engineering drawing No. UE 10150B, found at Bates number OAI 0126554, does not infringe any claim in the '371 Patent.

# **ADMISSION NO. 134**

Admit that Optrex LCD module no. DMF-50414NCU-FW-5 AF, having the structure shown in engineering drawing No. UE 10141B, found at Bates number OAI 0126556, does not infringe claim 3 of the '371 Patent.

Admit that Optrex LCD module no. DMF-50414NCU-FW-5 AF, having the structure shown in engineering drawing No. UE 10141B, found at Bates number OAI 0126556, does not infringe any claim in the '371 Patent.

#### **ADMISSION NO. 136**

Admit that Optrex LCD module no. DMF-50414NCU-FW-13 AP, having the structure shown in engineering drawing No. UE 10231, found at Bates number OAI 0126558, does not infringe claim 3 of the '371 Patent.

# **ADMISSION NO. 137**

Admit that Optrex LCD module no. DMF-50414NCU-FW-13 AP, having the structure shown in engineering drawing No. UE 10231, found at Bates number OAI 0126558, does not infringe any claim in the '371 Patent.

#### ADMISSION NO. 138

Admit that Optrex LCD module no. F-51161NCU-FW-AA, having the structure shown in engineering drawing No. UE 200306C, found at Bates number OAI 0126560, does not infringe claim 3 of the '371 Patent.

### **ADMISSION NO. 139**

Admit that Optrex LCD module no. F-51161NCU-FW-AA, having the structure shown in engineering drawing No. UE 200306C, found at Bates number OAI 0126560, does not infringe any claim in the '371 Patent.

# **ADMISSION NO. 140**

Admit that Optrex LCD module no. F-51719GNCJ-MLW-AD, having the structure shown in engineering drawing No. LGP51719F, found at Bates number OAI 0054065, does not infringe claim 3 of the '371 Patent.

### **ADMISSION NO. 141**

Admit that Optrex LCD module no. F-51719GNCJ-MLW-AD, having the structure shown in engineering drawing No. LGP51719F, found at Bates number OAI 0054065, does not infringe any claim in the '371 Patent.

Admit that Optrex LCD module no. F-51719GNCJ-MLW-AE, having the structure shown in engineering drawing No. LGP51719F, found at Bates number OAI 0054071, does not infringe claim 3 of the '371 Patent.

# **ADMISSION NO. 143**

Admit that Optrex LCD module no. F-51719GNCJ-MLW-AE, having the structure shown in engineering drawing No. LGP51719F, found at Bates number OAI 0054071, does not infringe any claim in the '371 Patent.

# **ADMISSION NO. 144**

Admit that Optrex LCD module no. F-51875GNCJ-MLW-ABN, having the structure shown in engineering drawing No. LEDBL51875C-W, with revision 2 dated August 5, 2005, found at Bates number OAI 0126536, does not infringe claim 3 of the '371 Patent.

# **ADMISSION NO. 145**

Admit that Optrex LCD module no. F-51875GNCJ-MLW-ABN, having the structure shown in engineering drawing No. LEDBL51875C-W, with revision 2 dated August 5, 2005, found at Bates number OAI 0126536, does not infringe any claim in the '371 Patent.

# **ADMISSION NO. 146**

Admit that Optrex LCD module no. T-51779GD017J-MLW-AA, having the structure shown in engineering drawing No. UE-312589, with revision 1 dated May 30, 2006, found at Bates number OAI 0121759, does not infringe claim 3 of the '371 Patent.

### **ADMISSION NO. 147**

Admit that Optrex LCD module no. T-51779GD017J-MLW-AA, having the structure shown in engineering drawing No. UE-312589, with revision 1 dated May 30, 2006, found at Bates number OAI 0121759, does not infringe any claim in the '371 Patent.

#### **ADMISSION NO. 148**

Admit that Optrex LCD module no. T-51779GD017J-MLW-AC, having the structure shown in engineering drawing No. UE-312589, with revision 1 dated May 30, 2006, found at Bates number OAI 0121759, does not infringe claim 3 of the '371 Patent.

Admit that Optrex LCD module no. T-51779GD017J-MLW-AC, having the structure shown in engineering drawing No. UE-312589, with revision 1 dated May 30, 2006, found at Bates number OAI 0121759, does not infringe any claim in the '371 Patent.

# **ADMISSION NO. 150**

Admit that Optrex LCD module no. T-51779GD017J-MLW-AD, having the structure shown in engineering drawing No. UE-312589, with revision 1 dated May 30, 2006, found at Bates number OAI 0121750, does not infringe claim 3 of the '371 Patent.

#### ADMISSION NO. 151

Admit that Optrex LCD module no. T-51779GD017J-MLW-AD, having the structure shown in engineering drawing No. UE-312589, with revision 1 dated May 30, 2006, found at Bates number OAI 0121750, does not infringe any claim in the '371 Patent.

# **ADMISSION NO. 152**

Admit that Optrex LCD module no. T-51826GD017J-MLW-ACN, having the structure shown in engineering drawing No. LEDBL51826A-W-3, with revision 1 dated April 19, 2006, found at Bates number OAI 0121730, does not infringe claim 3 of the '371 Patent.

#### **ADMISSION NO. 153**

Admit that Optrex LCD module no. T-51826GD017J-MLW-ACN, having the structure shown in engineering drawing No. LEDBL51826A-W-3, with revision 1 dated April 19, 2006, found at Bates number OAI 0121730, does not infringe any claim in the '371 Patent.

#### **ADMISSION NO. 154**

Admit that Optrex LCD module no. T-51911GD017J-MLW-AA, having the structure shown in engineering drawing No. UE-312606, with revision 1 dated May 29, 2006, found at Bates number OAI 0121566, does not infringe claim 3 of the '371 Patent.

#### **ADMISSION NO. 155**

Admit that Optrex LCD module no. T-51911GD017J-MLW-AA, having the structure shown in engineering drawing No. UE-312606, with revision 1 dated May 29, 2006, found at Bates number OAI 0121566, does not infringe any claim in the '371 Patent.

Admit that Optrex LCD module no. T-51911GD017J-MLW-AB, having the structure shown in engineering drawing No. UE-312606, with revision 1 dated May 29, 2006, found at Bates number OAI 0121573, does not infringe claim 3 of the '371 Patent.

# **ADMISSION NO. 157**

Admit that Optrex LCD module no. T-51911GD017J-MLW-AB, having the structure shown in engineering drawing No. UE-312606, with revision 1 dated May 29, 2006, found at Bates number OAI 0121573, does not infringe any claim in the '371 Patent.

# **ADMISSION NO. 158**

Admit that Optrex LCD module no. T-51911GD017J-MLW-AC, having the structure shown in engineering drawing No. UE-312606, with revision 1 dated May 29, 2006, found at Bates number OAI 0121573, does not infringe claim 3 of the '371 Patent.

# **ADMISSION NO. 159**

Admit that Optrex LCD module no. T-51911GD017J-MLW-AC, having the structure shown in engineering drawing No. UE-312606, with revision 1 dated May 29, 2006, found at Bates number OAI 0121573, does not infringe any claim in the '371 Patent.

#### ADMISSION NO. 160

Admit that Optrex LCD module no. T-51911GD017J-MLW-AD, having the structure shown in engineering drawing No. LEDBL51911-W-1, found at Bates number OAI 0121590, does not infringe claim 3 of the '371 Patent.

### **ADMISSION NO. 161**

Admit that Optrex LCD module no. T-51911GD017J-MLW-AD, having the structure shown in engineering drawing No. LEDBL51911-W-1, found at Bates number OAI 0121590, does not infringe any claim in the '371 Patent.

#### **ADMISSION NO. 162**

Admit that Optrex LCD module no. T-51911GD017J-MLW-AEN, having the structure shown in engineering drawing No. LEDBL51911-W-1, found at Bates number OAI 0121582, does not infringe claim 3 of the '371 Patent.

Admit that Optrex LCD module no. T-51911GD017J-MLW-AEN, having the structure shown in engineering drawing No. LEDBL51911-W-1, found at Bates number OAI 0121582, does not infringe any claim in the '371 Patent.

# **ADMISSION NO. 164**

Admit that Optrex LCD module no. T-51911GD017J-MLW-AFN, having the structure shown in engineering drawing No. LEDBL51911-W-1, found at Bates number OAI 0121596, does not infringe claim 3 of the '371 Patent.

# **ADMISSION NO. 165**

Admit that Optrex LCD module no. T-51911GD017J-MLW-AFN, having the structure shown in engineering drawing No. LEDBL51911-W-1, found at Bates number OAI 0121596, does not infringe any claim in the '371 Patent.

# **ADMISSION NO. 166**

Admit that Optrex LCD module no. T-51911GD017J-MLW-AGN, having the structure shown in engineering drawing No. LEDBL51911-W-2, found at Bates number OAI 0121603, does not infringe claim 3 of the '371 Patent.

#### **ADMISSION NO. 167**

Admit that Optrex LCD module no. T-51911GD017J-MLW-AGN, having the structure shown in engineering drawing No. LEDBL51911-W-2, found at Bates number OAI 0121603, does not infringe any claim in the '371 Patent.

### **ADMISSION NO. 168**

Admit that Optrex LCD module no. T-51912GD017J-MLW-AA, having the structure shown in engineering drawing No. UE-312589 with revision 1 dated May 30, 2006, found at Bates number OAI 0121740, does not infringe claim 3 of the '371 Patent.

#### ADMISSION NO. 169

Admit that Optrex LCD module no. T-51912GD017J-MLW-AA, having the structure shown in engineering drawing No. UE-312589 with revision 1 dated May 30, 2006, found at Bates number OAI 0121740, does not infringe any claim in the '371 Patent.

Admit that Optrex LCD module no. T-51912GD017J-MLW-AB, having the structure shown in engineering drawing No. UE-312589 with revision 1 dated May 30, 2006, found at Bates number OAI 0121740, does not infringe claim 3 of the '371 Patent.

# **ADMISSION NO. 171**

Admit that Optrex LCD module no. T-51912GD017J-MLW-AB, having the structure shown in engineering drawing No. UE-312589 with revision 1 dated May 30, 2006, found at Bates number OAI 0121740, does not infringe any claim in the '371 Patent.

# **ADMISSION NO. 172**

Admit that Optrex LCD module no. T-51912GD017J-MLW-ABN, having the structure shown in engineering drawing No. UE-312589 with revision 1 dated May 30, 2006, found at Bates number OAI 0121740, does not infringe claim 3 of the '371 Patent.

# **ADMISSION NO. 173**

Admit that Optrex LCD module no. T-51912GD017J-MLW-ABN, having the structure shown in engineering drawing No. UE-312589 with revision 1 dated May 30, 2006, found at Bates number OAI 0121740, does not infringe any claim in the '371 Patent.

#### **ADMISSION NO. 174**

Admit that Optrex LCD module no. T-51912GD017J-MLW-AC, having the structure shown in engineering drawing No. UE-312589 with revision 1 dated May 30, 2006, found at Bates number OAI 0121740, does not infringe claim 3 of the '371 Patent.

### **ADMISSION NO. 175**

Admit that Optrex LCD module no. T-51912GD017J-MLW-AC, having the structure shown in engineering drawing No. UE-312589 with revision 1 dated May 30, 2006, found at Bates number OAI 0121740, does not infringe any claim in the '371 Patent.

#### ADMISSION NO. 176

Admit that Optrex LCD module no. T-51963GD035J-MLW-AFN, having the structure shown in engineering drawing No. LEDBL51963B-W-1, found at Bates number OAI 0126531, does not infringe claim 3 of the '371 Patent.

Admit that Optrex LCD module no. T-51963GD035J-MLW-AFN, having the structure shown in engineering drawing No. LEDBL51963B-W-1, found at Bates number OAI 0126531, does not infringe any claim in the '371 Patent.

#### **ADMISSION NO. 178**

Admit that Optrex LCD module no. T-51963GD035J-MLW-AGN, having the structure shown in engineering drawing No. LEDBL51963B-W-1, found at Bates number OAI 0126531, does not infringe claim 3 of the '371 Patent.

### **ADMISSION NO. 179**

Admit that Optrex LCD module no. T-51963GD035J-MLW-AGN, having the structure shown in engineering drawing No. LEDBL51963B-W-1, found at Bates number OAI 0126531, does not infringe any claim in the '371 Patent.

#### **ADMISSION NO. 180**

Admit that Optrex LCD module no. T-51963GD035J-MLW-AHN, having the structure shown in engineering drawing No. LEDBL51963B-W-1, found at Bates number OAI 0126531, does not infringe claim 3 of the '371 Patent.

#### ADMISSION NO. 181

Admit that Optrex LCD module no. T-51963GD035J-MLW-AHN, having the structure shown in engineering drawing No. LEDBL51963B-W-1, found at Bates number OAI 0126531, does not infringe any claim in the '371 Patent.

### ADMISSION NO. 182

Admit that Optrex LCD module no. T-51963GD035J-MLW-AIN, having the structure shown in engineering drawing No. LEDBL51963B-W-1, found at Bates number OAI 0126531, does not infringe claim 3 of the '371 Patent.

#### ADMISSION NO. 183

Admit that Optrex LCD module no. T-51963GD035J-MLW-AIN, having the structure shown in engineering drawing No. LEDBL51963B-W-1, found at Bates number OAI 0126531, does not infringe any claim in the '371 Patent.

Admit that Optrex LCD module no. F-52016GNCJ-LW-ACN, containing the structures shown in engineering/part drawing Nos. SB3102B11 and SB3102B21 found at Bates numbers OAI 0126539 and OAI 0126540, does not infringe claim 3 of the '371 Patent.

# **ADMISSION NO. 185**

Admit that Optrex LCD module no. F-52016GNCJ-LW-ACN, containing the structures shown in engineering/part drawing Nos. SB3102B11 and SB3102B21 found at Bates numbers OAI 0126539 and OAI 0126540, does not infringe any claim in the '371 Patent.

### **ADMISSION NO. 186**

Admit that Optrex LCD module no. F-55014GNFJ-SLM-ACN, having the structure shown in engineering drawing No. LEDBL55014C-M, found at Bates number OAI 0126542, does not infringe claim 3 of the '371 Patent.

### **ADMISSION NO. 187**

Admit that Optrex LCD module no. F-55014GNFJ-SLM-ACN, having the structure shown in engineering drawing No. LEDBL55014C-M, found at Bates number OAI 0126542, does not infringe any claim in the '371 Patent.

# **ADMISSION NO. 188**

Admit that Optrex LCD module no. F-55020GNCJ-LW-AGN, having the structure shown in engineering drawing No. LEDBL55020A-W-1, found at Bates number OAI 0126544, does not infringe claim 3 of the '371 Patent.

### **ADMISSION NO. 189**

Admit that Optrex LCD module no. F-55020GNCJ-LW-AGN, having the structure shown in engineering drawing No. LEDBL55020A-W-1, found at Bates number OAI 0126544, does not infringe any claim in the '371 Patent.

# ADMISSION NO. 190

Admit that Optrex LCD module no. F-55130GNCJ-LW-AEN, having the structure shown in engineering drawing No. LGP55130B, found at Bates number OAI 0126546, does not infringe claim 3 of the '371 Patent.

Admit that Optrex LCD module no. F-55130GNCJ-LW-AEN, having the structure shown in engineering drawing No. LGP55130B, found at Bates number OAI 0126546, does not infringe any claim in the '371 Patent.

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June 4, 2007

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## **CERTIFICATE OF SERVICE**

I hereby certify that on June 6, 2007, I caused a copy of the foregoing document - Optrex America, Inc.'s Second Set of Requests for Admission (Nos. 30-191) to Honeywell - to be served on the following counsel of record in the manner indicated:

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